

A disciplinary hearing is scheduled on Wednesday August 8, 2007 at 4:00 pm to investigate the allegations brought against you by the Dean's office regarding " Misbehaving and offending a Faculty" The hearing will be held at the Faculty lounge on the west campus.

Members of the Committee will meet first and you will be asked to join them.

During this hearing:

1. You are allowed to present witnesses and documentary evidence.
2. You can address the Committee either orally or in writing.

You will be given 15 minutes for an opening statement and then you will be asked questions by the members of the Committee.

At the end of the hearing, you will be dismissed and the Committee will review your case and present a recommendation to the Dean's with their decision.

Any request for adjournment of the hearing must be in writing and must state the reason of the request.

Sincerely,

Chair of the Grievance and Disciplinary Committee

H. A. Morcos, MD, PhD

Chair of Pharmacology

American University of Antigua

College of Medicine

Jasmine Court, Friar's Hill Road

St John's Antigua

Tel: 268-481-8838

Email: hmoscos@auamed.net

<http://auamed.net/pharm>

From: Steve Woodward <steve_l_woodward@yahoo.com>

To: Dr Morcos <hmoscos@auamed.net>; Kevin Baker <baker_soft@yahoo.com>; Kevin Baker <kbaker@blindsaver.com>; Kim Volz <tdsdiver@comcast.net>; clerks@sallegalservices.com; Dr Bell <pbell@auamed.net>; Steve Woodward <stevenw@auamed.net>; Steve Woodward <steve_l_woodward@yahoo.com>

Sent: Mon, August 6, 2007 2:48:28 PM

Subject: Committee Meeting

Please reply to this email.

I sent several emails out last week concerning a committee hearing meeting, I have not heard a reply from any of them.

Thank you for your time,

Steve

----- Forwarded Message -----

From: Steve Woodward <steve_l_woodward@yahoo.com>

To: Dr Morcos <hmoscos@auamed.net>

Sent: Saturday, August 4, 2007 12:55:12 AM

Subject: Committee Meeting

Dr Morcos,

Seeing that I was not given a formal document stating the grievance against me and I am only working on assumptions, I would like to formally request a postponement of the hearing until after August 18th.

Without this document I can not seek legal counsel, build my case and gather proof, witnesses and documentation to support my case.

Seeing that the faculty has had unknown amount of time to gather the same witnesses and build their case this puts me in a disadvantage.

I've sent you emails that I only assume are in reference to any incident of a disagreement with a faculty member I've had this semester.

In reading these email, you'll see that even the class president agreed with what I said.

Today other students agreed with me, but as student are they look out for themselves so I need a formal document confirming my suspicion.

With the long weekend you are only giving me one day to build my case, with your exam on the 10th, this is not adequate time for me to gather the information regarding any incident. Having this meeting at this time also puts me in a disadvantage for asking fellow students to give up their study time for this hearing.

Thank you for your time,

Steve

From: Steve Woodward <steve_l_woodward@yahoo.com>

To: Dr Morcos <hmoscos@auamed.net>

Sent: Fri, August 3, 2007 8:24:06 AM

Subject: Committee Hearing

FYI

----- Forwarded Message -----

From: Je'Nelle Henderson <jenellejanet@yahoo.com>

To: Steve Woodward <steve_1_woodward@yahoo.com>

Sent: Thursday, July 19, 2007 7:28:29 PM

Subject: Re: Support

I do agree with everything that you have stated. 4th semester classes were brought up today at a student representative meeting. I will do all that I can when it comes to path because I do believe that the testing was unfair. And it directly effects me because right now I have to pull a rabbit out of my ass on the next path exam in order to pass the class and I really don't want to be here next semester. So know that I'm one of those students right now that needs all the help that I can get to pass path.

Je'Nelle

--- Steve Woodward <steve_1_woodward@yahoo.com> wrote:

> Oh yea!

>

> It would be nice if he had his presentations ready

> before class at least once this semester!

> It would be even better if they were ready far

> enough in advance we had time to read them.

> Like at the begining of the semester!

> And he has the right to tell us we're not prepared!

>

> Steve

>

>

> ----- Original Message -----

> From: Je'Nelle Henderson <jenellejanet@yahoo.com>

> To: Steve Woodward <steve_1_woodward@yahoo.com>

> Sent: Thursday, July 19, 2007 9:12:10 AM

> Subject: Re: Support

>

>

> Good morning Steve

>

> I spoke with Dr. Krishna after class yesterday about

> the weekly quizzes and mini 2. He assured me that

> these quizzes were just extra points and would not

> come out of our overall grading for the class. I

> told

> him that I was still concerned because many students

- > in class we still fail path even with the few
- > additional points due to the last exam. Naomi and
- > myself are currently preparing a proposal to Dr.
- > Krishna asking that he add an additional 5 to 10
- > points to every ones grade considering that more
- > than
- > two thirds of the class failed the last exam
- > including
- > myself. I will tell you how it all goes.
- >
- > Thank you
- > Je'Nelle

5. 20 U.S.C 1011(a) violations including violations of the Student Handbook

Section: Grievances and Disciplinary Action

“The student has the right to counsel and to present witnesses and documentary evidence”

“Rules of the hearing will be as you experienced in Antigua (*i.e.*, no recording device, no legal council”

This is a lie since I was allowed to record my opening statement.

The Committee Hearing refused to listen to the recording that would prove the students were innocent of any wrong doing.

From: William Cain <billcain@comcast.net>

To: steve_l_woodward@yahoo.com

Cc: sbarrie@auamed.org; jecmpark@aol.com; metellug@bellsouth.net; yanezj@trinity-

health.org; nikhielrau@gmail.com; pbell@auamed.net; "vhrehorovich@auamed.org"

<vhrehorovich@AUAMED.ORG>

Sent: Wed, December 19, 2007 11:47:13 AM

Subject: Notice of Grievance Committee hearing

Steve Woodward, Med Student V:

An American University of Antigua Faculty Grievance and Disciplinary Committee has been examining the subject introduced to you by Dr. Zonia (memo from Dr. Zonia to Dr. Calderon , December 17, 2007 , RE: V Semester).

According to Dr. Zonia 's memo and evidence available to the Committee, you may again be in violation of articles contained in the American University of Antigua Student Handbook (AUA-KMC_2007 Student Handbook_v71807, pp. 12-14). More specifically, the committee has received evidence suggesting that your demeanor has continued to be inappropriate in that you have rudely and unprofessionally vented anger toward the AUA curriculum, failed to answer hospital pages, selected an unseemly username in ExamMaster and defended the epithet when challenged.

A hearing with regard to your conduct will be held by conference call at 10:00 AM , Friday 21Dec07. Please speak to Zonia for access to a private room and telephone connection. Rules of the hearing will be as you experienced in Antigua (*i.e.*, no recording device, no legal council, written and/or verbal responses to committee questions, availability of evidence and witnesses, right to cross examine, *etc.*) During the hearing, you will be questioned by Committee

members. Please respond directly to the questions asked, and please keep your responses brief and succinct. If you wish to make an opening statement, you will have five minutes for that purpose. If you have more to say than you can express within five minutes, please type it up and distribute it to the committee prior to the hearing.

After the meeting, the Committee will report to the appropriate dean(s). You will not receive a copy of the Committee's recommendation from the Committee. The dean(s) will further dispose of this matter. Under some conditions (stated in the Student Handbook, p13) you have the right to appeal the Deans' action to the President of the University in which case you may be represented by legal council.

If you have any questions, please address them directly to me. You may reach me by email reply or call me at (410) 299-5550 .

Thank you.

William A. Cain , Ph.D.

AUA Faculty Grievance Committee Chair

6. Example of violations of Student Civil Rights by AUA Dr. Singh was aiding one group of student over another.

This so-called Committee Meeting by AUA was specifically targeting a student for exercising their Freedom of Speech as protected by 20 U.S.C. 1011(a) Protection of student speech and association rights.

From: Steve Woodward <steve_l_woodward@yahoo.com>

To: Dr Bell <pbell@auamed.net>

Sent: Mon, July 31, 2006 8:38:00 AM

Subject: Exams and information

Dear Dr. Bell,

Last Friday Dr Singh came into our class warning the students that there was going to be legal actions taken against students that are spreading rumors that he is giving out the "Shelf Exam". I understand the implications the school would have if a professor actually did such a thing. I feel this is not the real problem.

The problem is information that is available to some students yet not to others.

We have professors and classmates that offer sample tests, tutoring services and other information to some students, but other students are not notified that this information/service is available.

Most of the students I know rely on information given us by senior classmates that have had the course either here, Ross or other institutions to study for exams.

As you are aware sample questions, old exams, tutoring services, study guides and other information are vital for students that are trying to learn this volume of information while being tested on such a small amount of it. Three quarters of the books I purchased last semester are worthless for exams compared to the information from other students and instructors.

In my opinion, this is the real issue; it's UNFAIR to all the students that do not have the contacts or get such information and help. We have a lot of money and time invested in this school and our education. I feel it is unethical for the school to rank and fail students when some are privileged.

I propose the following:

- Make all information available. To do this have your computer support personnel create a directory for each class offered. Open it up so students and professors can "check in" information that would help other students. This could be a liability issue if the students checked in such things as Kaplan review videos and etc.
- Old exams. Make all old exams available for review. This is widely done and practised in other universities and colleges. This way not only can the student review the information they learned, they can also focus on important areas and learn the professors exam style. This would be no different compared with Q-bank or the U. Michigan exam site.
- Stop ranking students. Some universities have stopped ranking students. There is no pass/fail exam. The students are given a clear syllabus of exact topics, definitions and information they need to learn. The student either knows the information or not. This determines if they are allowed to continue. I have not attended such a school but I spent time here talking to one of their professors.

This is just my opinion.

Thank you for your time,

Steve Woodward.

---Instead the School Punished the Student

From: "yesbillstewart@netscape.net" <yesbillstewart@netscape.net>

To: rsanii@auamed.net

Cc: pbell@auamed.net; NSSimon@auamed.org; VStanescu@hotmail.com; rhannah@ucalgary.ca;

SBirch@auamed.org; jplutzky@auamed.org; jplutzky@auamed.net; jmoreno@auamed.net;

alueck@auamed.net; donkastuk@auamed.net; pganguly@auamed.net; wacain@auamed.net;

BGelles@auamed.org; FPrecil@auamed.org; MMcgillicuddy@auamed.org;

TCarlson@auamed.org; Clinical@auamed.org; HumanResources@auamed.org

Sent: Fri, August 11, 2006 7:51:31 PM

Subject: the grievance is not with me, it is actually with Dr. Singh / Re: circulating email

Dear Reza,

You need to exercise some integrity and just refuse Peter Bell's request for you to perform an unethical castigation of me for confirming to AUA that complaints about Dr. Singh are true, and that Dr. Singh did distribute a document that clearly states that it contains questions from a standardized exam published by the National Board of Medical Examineers, called a shelf exam for Spring 2003. Reza, you need to walk away from this one. It is the right thing to do. You do not need to lie and cheat for Peter Bell or Dr. Singh. You are too good

professionally for that. Do not allow yourself to be used, the way Dr. Singh used you two weeks ago in your class.

As you know, distribution of standardized exam questions in most jurisdictions is an indictable offense (considered a felony) by a grand jury within the USA. You might say, well we are on an island and not subject to USA laws. If the American University of Antigua has any banking relationships within the USA, and it does, I have been told it could be pulled into the mess. If AUA stands by Dr. Singh, AUA as an institution may not be solvent much longer due to criminal prosecution.

Peter Bell has sufficient evidence to immediately take the resignation of Dr. Singh, or to put Dr. Singh on administrative leave of absence for distribution of a document which states in it that it contains questions from the Spring 2003 shelf exam for Gross Anatomy. **Hopefully someone in the AUA**

administration will read this and finally put an end to the culture of cheating at AUA and terminate professors who distribute exams to students and teach students poor ethics and dishonesty. Any leader with integrity would rise up with moral indignation and demand a

resignation from the subordinate who behaved in a

manner that tainted 100 students ethics. The document actually distributed last semester is currently in the possession of Dr. Stanescu, who obtained it from a student who was one of the 100 students given it by Dr. Singh. Approximately 100 AUA students have been told by AUA faculty not to tell anyone on the AUA faculty what Dr. Singh did.

It appears that Peter Bell would like to burn me for reporting to him that Dr. Singh lied to an entire medical school class, which was the truth, and you - Dr. Sanii, now also know that it is the truth that Dr. Singh lied to the entire 2nd semester class, as does approximately 100 students who received the purported shelf exam questions from Dr. Singh the semester before. Hypocrisy is a terrible thing! **It may be time to fire Peter Bell for completely mishandling the situation and trying to burn a student instead of addressing the misconduct of a professor at AUA.**

You have a conflict of interest in any proceeding regarding Dr. Singh's unethical behavior, and dissemination of standardized exam questions, as it was your class this semester where Dr.

Singh lied to the entire class, and you personally supported him, during his lies to the class, and during the threats against students who related the facts of unethical incidents occurring at AUA. In all honesty, you need to therefore recuse yourself from any proceedings relating to same, and instead be a witness against Dr. Singh.

If you desire a copy of the original documentation distributed by Dr. Singh to the 2nd semester class, during first semester, for preparation to take the Gross Anatomy shelf exam, you may obtain it from Dr. Stanescu. Keep in mind that this is NOT the documentation that Dr. Singh was trying to pass off as what he had distributed last semester. I do not have time to waste on **sham committees that pretend to investigate something**, and then turn around the facts and try to penalize the well meaning individual who merely is making the school aware of the problem. Over 100 students were given the true document and know the facts concerning the document Dr. Singh distributed.

It now appears that the administration may have encouraged the distribution of the document to boost the scores of students on a shelf exam in order to claim that the AUA curriculum was adequate for state accreditation. The school should be asking each and every

one of the students that were in the gross anatomy class last semester individually, after showing them the document that Dr. Stanescu has in his possession:

1. have they ever seen the document?
2. where did they see it?
3. who showed it to them?
4. was it given out to members of their class by Dr. Singh?
5. etc.

in order to determine the facts. Do not focus your energies on one student and try to make it appear that that student is an instigator, when you know that there is a faculty member who definitely is a culprit. I have told the school in writing everything that I know regarding Dr. Singh from the Friday in question.

Let it be known that every email that I have written to the school is true and factual.

Any appearances by me to advise the AUA College of Medicine in the future will require payment of consulting fees in advance via wire transfer. The current rate for my services is \$100/hour in US currency, portal to portal, plus expenses, with a minimum \$5000 US retainer. This email the last "freebee" that I am giving to AUA.

I have provided an overwhelming amount of charity work to AUA already, more than any other student at the school. My professional services have an established market rate and value.

If you are serious about wanting my services, then please have your contracts designee call my business office at (408)702-7676 and ask to speak with Ms. Aubree Guancione.

Regards,

Bill Stewart

P.S. If any AUA students get a copy of this email, please distribute it to all the AUA students that you know, as Peter Bell claims that no other student told him that Dr. Singh distributed the Spring 2003 shelf exam questions for gross anatomy last semester in gross anatomy lecture prior to the scheduled shelf exam final that was later cancelled.

-----Original Message-----

From: Dr. R. Sanii <rsanii@auamed.net>

To: yesbillstewart@netscape.net

Sent: Thu, 10 Aug 2006 18:31:00 -0700

Subject: circulating email

Dear Mr. William Stewart:

Dr. Bell, vice president of academic affairs and Dean, has instructed me to chair a grievance committee to investigate the content of an email circulating among students that has originated from your email address. I will inform you of the time and place where your appearance would be required before this committee.

Sincerely yours

Dr. R. Sanii

Professor and chair

Department of physiology

From: Jorge Moreno <jmoreno@auamed.net>

To: yesbillstewart@netscape.net

Sent: Mon, 14 Aug 2006 14:35:14 -0600

Subject: Inquiry

Dear Bill,

How goes all? Hope all is well.

On 10 August 2006, I was assigned to investigate your statements regarding the release of shelf exam questions by Dr. Singh. I have queried a number of individuals but still need additional information. I especially need information regarding the following:

You claimed that Dr. Singh handed out a document entitled "Gross Anatomy Shelf Review."

I have a copy of this document, courtesy of Drs. Stanescu and Bell . My question is:

Who gave you this document and did this person receive said item from Dr. Singh?

Any help that you can offer would be greatly appreciated.

Sincerely

Dr. Moreno

7. **From:** Dr. R. Sanii <rsanii@auamed.net>

To: Steve Woodward <steve_l_woodward@yahoo.com>

Sent: Sun, August 13, 2006 2:28:03 PM

Subject: RE: AUA

Dear Steve;

Thank you for your email. I did read your email with great interest and concern. I think you have brought up few very important and valuable points. I take it that you are very concern and care for this institute. Me too. I like to see student being motivated and have a chance to learn and advance in a very healthy scientific environment. I think it will be helpful (may be productive) if we meet and put our thought together to find a solution for at least those issues related to SGA responsibility. I like to wish you all the best on all your finals.

R.Sanii

From: Steve Woodward [mailto:steve_l_woodward@yahoo.com]

Sent: Saturday, August 12, 2006 12:02 PM

To: rsanii@auamed.net

Subject: AUA

Dr Sanii,

There are a couple other issues that need to be addressed that are directly tied to the emails Bill Stewart has written.

You joked with me about how when the phone rings in the faculty lounge that it's for Dr Singh and it's a specific student. Students in 5th semester often joke about Dr Glasser's affairs and private parties he had on St Martin. I can only tell what I heard so it's all

"hear say". This island is small and several of AUA's professors are known as drunks, womanizers and perverts. I have witnessed this behavior first hand.

Dr Singh and other professors, including Dr Belle, have on several occasions made comments about the intelligence of the students at AUA.

I resent these comments, unless the staff is a Nobel Prize winner or has credentials from MIT, they have no room to talk about intelligence of the students. These comments include statements of low performance on exams by our class. We were told that Dr Belle will fail half the Biochemistry class if we did not increase our grades. As you stated to me this is an false statement and should not have been made. Like you stated "this should not have been said". I question the credentials of some of the faculty, i.e. Mr Leuck. Dr Glasser should not have stood in front of the class and asked if anyone was upset about Dr Singh's comments. I for one was, it was uncalled for and should not have been done.

It seems that faculty, including the guards and maintenance staff have a "Holli-er than thou" attitude toward the students. This is witnessed everywhere.

Example 1: Sings stating that a student defecated in a trashcan.

What would drive anyone to defecate in a trashcan? Instead of dealing with the real topic the faculty points fingers at the students mentality. The real issue is the fact that we have inadequate restroom facilities for the student population on the West campus. When these facilities are closed(for two weeks), have no water or are not cleaned.

Students(any person in general) is going to take drastic steps when they only have 5 minutes or less between classes or have to go across the street to use the restrooms there.

The faculty should instead ask "Why are the students acting like this"

Next time you have to use the toilet instead of using the faculty, air conditioned one, you go sit with the mosquitoes, centipedes and lack of water to wash your hands!

Example 2:

Lockers for the Library! Dr Belle told me directly that the school would like to "rent" them out to the students so they can store their books between classes.

Next time you go to work, take only what you can carry to your office: NO BAGS, NO BRIEFCASES! Anytime you need something you go out to your car to get it. Do all your work outside in the heat for one day. This is how the school deals with the fact that AUA couldn't figure out how to layout a library the first time to protect their books. They should have put the books behind the counter so they would be safe and could be checked out.

Example 3:

Don't park your car behind the West Campus. Try to find parking across the road and walk across the street to your office, in the rain.

In my oppinion the AUA faculty create most of the problems with this school!

Thank you for your time,

Steve Woodward

8. **From:** John Hayden <jhayden@auamed.net>

To: Steve Woodward <steve_l_woodward@yahoo.com>

Sent: Fri, June 8, 2007 10:06:17 AM

Subject: RE: Hospital

Steve,

Thanks for the pictures and your help with this. All great suggestions. I'll visit the hospital again to get the feel of the layout and will draw a rough sketch.

Bill

From: Steve Woodward [mailto:steve_l_woodward@yahoo.com]

Sent: Thursday, June 07, 2007 6:42 PM

To: jhayden@auamed.net

Subject: Hospital

Dr Hayden,

Per our conversation about the hospital.

Please let me prepare something you and AUA can use, let me get you something Tuesday.

I need to study for my Pharm exam this weekend.

Thanks

Steve

9. **Exhibit 98**, This email clearly demonstrates that there is no coordination within the AUA Clinical Program. That if there is now coordination between the programs it is because of Steven Woodward.

Also, appreciate the info about 5th semester. **As of yet I am unaware of any attempts to coordinate what goes on there with what's happening here. Obviously, we should be and**

hopefully, that will change on a go forward basis. Being the new guy on the block, I'm not at liberty to rock the boat until I'm sure I have my feet on solid ground. However, I understand what you are saying and your input as well as your student colleagues is helpful and constructive. Change will come thanks to your efforts. Unfortunately, as a trail blazer, you yourself won't benefit from the path you are creating. But that's usually the case for leaders and forward thinkers.

Bill

10. **Exhibit 99** Date July 21, 2007

Dr. Bell

Here's a couple ideas you might like:

Tickets to students that don't follow rules.

e.g: If a student brings food into a classroom and a guard catches them they get written up for a \$10.00 ticket.

If they talk back to a guard or staff, \$50.00 ticket. You could also make the points work toward dismissal.

Exhibit AB 2009 Student Handbook, page 43

Fine Schedule: \$50.00EC

-Driving of parking on campus without a current student parking permit permanently affixed to the windshield.

-Exhibiting rude behavior towards security guards while performing their duties.

11. This Email Demonstrates the lack of communication between US Clinical program and the Antigua Clinical program. If there is communication between the Clinical programs it is because of Steven Woodward.

From: John Hayden <jhayden@auamed.net>
To: Steve Woodward <steve_l_woodward@yahoo.com>
Sent: Mon, September 17, 2007 11:51:44 AM
Subject: RE: Fwd: FORMS

Hey Steve,

Thanks for the mail and forms. I will present them to the faculty so that we can consider incorporating them into our program.

Hope you are doing well. I saw Halo being transported somewhere in Jolly Harbour – perhaps for hull cleaning or storage.

Hit me a not when u can.

Bill

From: Steve Woodward [mailto:steve_l_woodward@yahoo.com]
Sent: Sunday, September 16, 2007 11:32 AM
To: Dr Hayden
Subject: Fw: Fwd: FORMS

----- Forwarded Message -----

From: Deneen Nicks <NICKSD@trinity-health.org>
To: steve_l_woodward@yahoo.com
Sent: Tuesday, September 11, 2007 11:43:18 AM
Subject: Fwd: FORMS

Please see the forms attached below.

Sincerely,

Deneen Nicks

Coordinator, Student Services

St. Joseph Mercy Oakland

Pontiac , Michigan

>>> <JECMPARK@aol.com> 9/2/2007 8:55 PM >>>

The attached forms are included in the "Fifth Semester Guidelines" that I will send to you by Wednesday.

I am attaching those to this e-mail since the students need to start filling them as soon as they start the Course.

The first one is for registration of any patient they see anywhere. They will circle whether they observed, examined, discussed the case..., etc., and also where they did it (Outpatient, hospital wards, etc.). Then, they will write down the working or main diagnosis, the cardinal symptoms and signs and any observations they wish to add. In our experience, the form has been very useful to evaluate the rotations and for the students to review the cases later.

The second form is a register of any academic activity each student has attended.

Both forms are part of a Portfolio that also includes # 15 two-minutes presentations, 15 templates, 2 hospital admissions full write-ups and the students evaluations of academic activities the students should turn-in by week twelfth.

Could you, please, e-mail the form to your students with instructions to start filling them immediately as the Course starts?

Next, I will e-mail the students evaluation forms to you. They also are included into the Guidelines.

Best regards,

JEC

12. **Exhibit 100** U of M Anesthesia Clinic

Deneen,

I would like permission to attend an anesthesia clinic on November 21.

This is the Airway Clinic of U of M, Master of Science, Anesthesia program.

I would like to request that this be an excused absents since I will have the opportunity to learn and teach a station at the clinic.

I will provide the course outline as soon as I receive it.

I was also told that I can invite 4 other students.

I have already talked to students that are interested in this class, if it is an excused absence I will tell them to make a similar leave request.

Thank you for your time,

Steve

13. Anesthesia Clinic and Patient Injections

From: Steve Woodward <steve_l_woodward@yahoo.com>

To: jhayden@auamed.net

Sent: Thu, November 29, 2007 4:19:05 PM

Subject: Re: Injections

Dr Hayden,

Will do!

Steve

----- Original Message -----

From: John Hayden <jhayden@auamed.net>

To: Steve Woodward <steve_l_woodward@yahoo.com>

Sent: Thursday, November 29, 2007 9:05:50 AM

Subject: RE: Injections

Thanks for the note, Steve. Let me know when you get back down.

Bill

From: Steve Woodward [mailto:steve_l_woodward@yahoo.com]

Sent: Wednesday, November 28, 2007 1:04 AM

To: jhayden@auamed.net

Subject: Re: Injections

Dr Hayden,

Good hearing from you too.

I'm really liking family medicine, the doctor I'm with is great a lot better than the hospital.

After working in high-tech engineering firms for so long I think I would go crazy working in a hospital.

I'm not sure when I can get back down to Antigua , it all depends on AUA and they haven't given us a schedule for our last exams yet. This semester is a mess, AUA is the cause for all of it even the doctors at the hospital think so too.

The hospital was a waste of time, since we couldn't do anything and since all the training is so unorganised. None of it prep'd us for the Step. As for the cricothyrotomy I learned that at my sister's hospital, Hurely in Flint , U of M anesthesia program. I learn the procedures so I could help with the CRNA airway clinic. I learned more that one day than I did the entire rest of the semester at St Josephs. There's nothing here that we could learn on Antigua , better too since we can actually have a conversation with the patients and doctors..

I'll deffinately contact you when I get a chance to buy my tickets back to the island.

Take care,

Steve

----- Original Message -----

From: John Hayden <jhayden@auamed.net>

To: Steve Woodward <steve_1_woodward@yahoo.com>

Sent: Tuesday, November 27, 2007 12:18:11 PM

Subject: RE: Injections

Hey Steve,

Great hearing from you. Thanks for the feedback and the suggestions. Sounds like you are getting some great hands on experience. When I was a student on a thoracic rotation, we placed a lot of cricothyroid catheters in post-op lung patients so that we could stimulate a cough reflex as they were reluctant to produce a cough themselves because of pain. I like your suggestion about injection training and will consider incorporating that into the curriculum.

A number of students here participated in a prostate screening program with a doc who visited the island and he was pleased to get the help and from what I have heard, it was a worthwhile learning program from their point of view.

Always enjoy hearing from you. Are you coming back during your break to get your boat? I am leaving on Dec 21st for the break. If you get back before then, let me know.

Sincerely,

Bill

From: Steve Woodward [mailto:steve_1_woodward@yahoo.com]

Sent: Monday, November 26, 2007 8:25 PM

To: Dr Hayden

Subject: Injections

Dr Hayden,

How's it going?

Hope things are good with you and you had a great Thanksgivings.

I was thinking about another issue you might want to cover in ICM/DPS, "Injections"

I was asked to give an injection for pain meds. I didn't for a couple reasons, one the patient was in severe pain and his daughter was there, she was a retired Nurse. I have never given anyone an injection before.

I didn't want to chance hitting this 80+yo mans sciatic nerve or etc....

I've since practiced with an orange and read the Nursing guide on how to give an injection: subdermal, SC and IM.

On the 21st I worked a station for the advanced airway clinic for the University of Michigan anesthesia class at Hurley hospital.

I learned how to do a cryothyrotomy and transtracheal jet ventilation. I then demonstrated teh procedure to the 30+ students etc in the clinic. I learned a lot....

Take care,

Steve

Exhibit 101, Letter of Appreciation from U of M Anesthesia Program, from Lynn L. Lebeck, PhD.

“We want to express our sincere appreciation to you for the creation and donation of the Fiberoptic Training Device. Although our students do get opportunities to use training devices in the simulation laboratory at William Beaumont Hospital, that experience is only available several times per year. The opportunities to practice manipulation of the fiberscope at any time will increase the proficiency, self, confidence, and likelihood of student successfully using fiberoptic scopes in the delivery of anesthesia care. Your creativity in creating a usable practice device out of ordinary materials is remarkable and we look forward to future creations.”

V. No actual Injury caused by the Defendant

The Plaintiff has not demonstrated that there is any injury caused by the Defendant.

The Plaintiff has admitted that the information posted on the Defendant’s website is in fact **true**.

The Plaintiff fails to follow International Standards for creating website Domain Names.

The Plaintiff admits company information is NOT filed as a trademark, and would most likely never be to since it’s either generic or violates other trademarks and logos.

The Plaintiff fails to follow their own Student Handbook contractual policies and Federal Laws, including those for protecting Students, Private Student Information, Committee Meeting Guidelines and US Federal Laws.

The Plaintiff fails to follow United States Laws to safeguard student safety.

The Plaintiff fails to obtain basic requirements to get accreditation for programs, thus admits to issuing worthless diplomas.

Fox News reports on that AUA: cheats, lies, and robs their students; that AUA should be exposed for issuing worthless diplomas, and fails to follow basic accreditation rules.

Neal Simon admits these facts and offers to reimburse the students for AUA's admitted cheating, robbing, lying, and producing worthless diplomas.

News agencies, including local News agencies and authorities, report on AUA student sexual assault, AUA students being robbed and cheated by AUA, the death of their student and crimes on Antigua.

ValueMD school summaries show AUA with low scores and negative student comments.

AUA admits that their loan situation "**sucks**" as quoted in a public student forum by Richard Woodward, Vice President for Enrollment Management(no known relation to defendant).

Counsel for AUA is reported for being imprisoned for their role in kidnapping a patient.

St Joseph Mercy Oakland hospital admitted fraud as reported by the FBI

Susan Zonia, has been terminated, makes claims including hiring workers that violate immigration laws working as doctors at St Joseph Mercy Oakland hospital.

Neal Simon is a proven liar, under oath equating to perjury, by the mere fact that he tried to blame the Defendant for AUA's disclosure of student grades and false statements, his contractual signature is worthless, in the Defendants opinion.

AUA's example of damages includes totally unsubstantiated and unreliable source such as a user login DuckandDeerGrinder that publishes written hateful and vulgar comments in public.

AUA faculty and administration is AUA's problem

Hopefully, AUA's faculty and administration change their need to blame others and take responsibility for their own negligence and inherent corrupt behavior before MORE students are robbed, cheated, harmed or die by the hands of the Doctors, Faculty, Counselors, and Administration associated with The American University of Antigua College of Medicine.

List of Exhibits:

A. Disk of electronic exhibits files:

- AA: 0ff4865aaa241e8eeeeec316b4338c32.20110511025521.0716970.mp4 Fox News
- AB: AUA-STUDENT-HANDBOOK-11-25-09.pdf
- AC: AUA-KMCStudentHandbook2007.pdf
- AD: Fifth Semester Syllabus – Final Revised.pdf
- AE: GUIDELINESFINALDRAFT_9-04-07_second_editing_(3).pdf
- AF: Biochemistry Review

Oakland County Court

1. FBI Health Care Fraud and Abuse Control Program Annual Report 2005
2. Susan Zonia v Trinity Health Michigan
3. David Gunsberg P24235 Notice of Suspension
4. Ohio.com, David Gunsberg Ordered to serve 30 days in jail
5. AUA v Woodward Docket 1
6. Email From: Paul Nicoletti, Subject: Steven Woodward v Trinity Health-Mich Dec 20, 2007
7. AUA Letter of Dismissal of Steven Woodward May 21, 2008
8. 5th Semester Final Grades AUA and St Joseph Mercy Oakland
9. 5th Semester Final Exam Scores –Scholar360
10. Defendants Trinity Health-Michigan and Susan Zonia's Case Evaluation
11. Brief in Support of Answer to Plaintiff's Motion for Entry of Default and Judgment
12. AUA and St Joseph Mercy Oakland Hospital Contract
13. 5th Semester Schedule of Clinical Rotations
14. Outpatient Evaluation
15. In-Patient Evaluation
16. Susan Zonia's Memo
17. Susan Zonia's Deposition

-

Trademark Infringement and Cybersquatting

18. USPTO Search: "American University of Antigua"
19. USPTO Search: "auamed"
20. USPTO Search: "AUA" Taken Genetic Code
21. Whois "aua.com"
22. www.Austrian.com
23. Whois Austrian.com
24. American University of Athens
25. www.aua.edu American University of Athens
26. American University of Athens Logo "AUA"
27. www.aua.org
28. American Urological Association, www.aua.org
29. Whois aua.org
30. Assyrian Universal Alliance, www.aua.net
31. Whois aua.net
32. www.auamed.com

33. www.med.com
34. www.med.org
35. www.auamed.org
36. Whois auamed.org, GCLR.LLC
37. Whois auamed.net, GCLR, LLC
38. IANA Top Level Domains Database (partial)
39. ICANN
40. Ross University www.ross.edu
41. Dr. Patt Goff email address PGoff@rossmed.edu.dm
42. Dr. Mike Smith email address msmith@rossvet.edu.kn
43. Whois aua-med.edu
44. Whois auamed.edu
45. Whois auavet.com
46. Whois auavet.org
47. Whois auanursing.org
48. Whois auanusing.com
49. Partial Transcript April 19, 2010 Hearing Before Honorable P. J. Duggan, page 7

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Defamation

50. Partial Transcript April 19, 2010 Hearing Before Honorable P.J. Duggan, pages 12-16, 19.
51. AUA Accused of Awarding Worthless Degrees
52. Threat of Legal Action in AUA Debacle
53. Med Student Found Dead
54. Drowning-dead-med-student-0.jpg
55. Country defined as 'culturally unethical' place
56. Murder, Sexual Offences Top Police Stats
57. Police Officer Guilty
58. US State Dept. Antigua Barbuda (partial)
59. Death Island
60. Star Clipper drops Antigua in wake of murder of cruise ship passenger
61. Cruise Passengers Attacked & Robbed in Antigua
62. Welcome to Antigua: Welcome to Rape, Brides, Money-Laundering, Corruption
63. Caribbean shooting: Antigua has murder rate three times higher than New York
64. Post-mortem reveals tourist died from stab wound
65. A newly married British doctor has been killed
66. Doctor dies in honeymoon shooting
67. Cuban doctor is third murder victim for the year
68. Teenage mother to serve two years for infanticide
69. Police investigate possible death of another baby
70. Map AUA Campus
71. Clare Hall "Bosnia" to AUA
72. Gunmen terrorise "Bosnia"
73. Jabberwock Beach
74. Haider Raza-Rizvi
75. Burnout and Suicidal ideation among U.S. Medical Students

76. Crime in Antigua, ValueMD
77. Student was beaten, ValueMD, Moderator
78. Tipton Carlson, intimidation
79. ValueMD Permanently Banned
80. What Jeanne Didn't know
81. Clery Act History
82. Physical Diagnosis, sexual assault
83. AUA student sexual assault
84. AUA Advertisement – World Class Education
85. AUA is located in vibrant...
86. AUA Recreation & Activities
87. AUA, Antigua similar to that of the U.S.
88. ValueMD Statistics
89. James Davis Plea Agreement Stanford Fraud
90. YouTube Channel Comments (7)
91. DuckandDeerGrinder
92. Bing search DuckandDeerGrinder
93. DuckandDeerGrinder Islamic religion
94. DuckandDeerGrinder Go Fuck Yourself
95. DuckandDeerGrinder Fuck sleiman
96. AUA Official says Loan Situation "Sucks"

-Concent

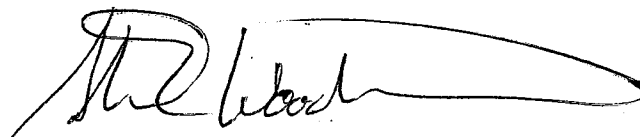
97. Docket 72, Opinion and Order
98. Email From Dr. Hayden, Trail Blazer
99. Email to Peter Bell, Ticketing Students
100. Anesthesia Clinic, Email to Deneen
101. UofM Appreciation Letter.

Steven Woodward

7211 Brittwood Ln

Flint, MI 48507

(810)235-7267

A handwritten signature in black ink, appearing to read "Steve Woodward", with a long horizontal flourish extending to the right.

**The Department of Health and Human Services
And
The Department of Justice
Health Care Fraud and Abuse Control Program
Annual Report For FY 2005**

AUGUST 2006

EXHIBIT /

- ▶ A certified nurse aide (CNA) in Colorado was excluded for 25 years as a result of being convicted for sexual assault against an elderly nursing home patient who suffered from Alzheimer's. The aide was sentenced to serve 15 years-to-life in prison.
- ▶ An Oklahoma pediatrician was excluded for 50 years based on his conviction for abuse of minor patients. The physician confessed to abusing 18 children, all under the age of 16, over a period that spanned 20 years.
- ▶ A DME sales representative in Florida was excluded for 28 years after his conviction for participating in a scheme to bill Medicare for millions of dollars in medically unnecessary DME items.
- ▶ A South Carolina physician was excluded for 26 years after his conviction for his part in a scheme to sell prescriptions for controlled substances such as OxyContin and Percocet.

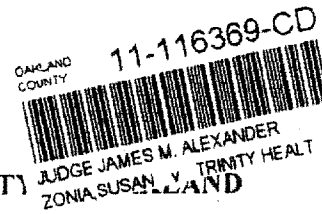
Other Administrative Enforcement Actions – Civil Monetary Penalties

The Office of Inspector General has authority to impose civil monetary penalties (CMPs) against providers and suppliers who knowingly submit false claims to the government, who participate in unlawful patient referral or kickback schemes, who fail to appropriately treat or refer patients who present at hospital emergency rooms, or who engage in other activities prescribed in statute. The HHS/OIG has stepped up its affirmative enforcement actions under these authorities. The PharMerica case discussed previously is one example. Others are:

- ▶ The Visiting Nurse Association of Washington, D.C. (now MedStar Health Visiting Nurse Association) and its home office, Visiting Nurse Association, Inc., agreed to pay more than \$1.3 million to resolve its liability for allegedly filing Medicare cost reports containing services that were not provided as claimed. The inquiry involved alleged transactions with related third parties that were not disclosed or documented. The company also entered a five-year CIA.
- ▶ A former hospital Chief Executive Officer (CEO) in Nebraska entered an agreement with the HHS/OIG to resolve his potential liability for allegedly paying kickbacks to a physician in the form of loan guarantees, consultant fees and discounts in exchange for referral of Medicare business. The CEO, too, received annual bonuses that allegedly were based on the referrals. The hospital previously entered a settlement agreement with the United States to resolve potential liability under the FCA for the same alleged conduct.
- ▶ St. Joseph Mercy-Oakland Hospital in Michigan agreed to pay \$4 million for allegedly violating the anti-kickback statute and Stark law in connection with financial arrangements between the hospital and more than a dozen physician groups. The hospital voluntarily disclosed the potential violations under the HHS/OIG's "Provider Self-Disclosure Protocol."

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STATE OF MICHIGAN
IN THE CIRCUIT COURT FOR THE COUNTY



SUSAN ZONIA,

Plaintiff,

CASE NO. 2010

CD

-vs-

HON.

TRINITY HEALTH MICHIGAN
d/b/a ST. JOSEPH MERCY
HOSPITAL, PONTIAC
a domestic corporation.
Defendant.

DEBORAH L. GORDON, PLC
Deborah L. Gordon (P27058)
Carol Laughbaum (P41711)
Attorneys for Plaintiff
33 Bloomfield Hills Parkway, Suite 275
Bloomfield Hills Michigan 48304
Telephone 248 258 2500

BY:
DEPUTY COUNTY CLERK

2011 JAN 20 PM 2:19

RECEIVED FOR FILING
OAKLAND COUNTY CLERK

COMPLAINT AND DEMAND FOR JURY TRIAL

There is no other civil action between these parties arising out of the same transaction or occurrence as alleged in this complaint pending in this court, nor has any such action been previously filed and dismissed after having been assigned to a judge, nor do I know of any other civil action, not between these parties, arising out of the same occurrence as alleged in this complaint that is either pending or was previously filed and dismissed, transferred, or otherwise disposed of after having been assigned to a judge in this court.

Plaintiff Susan Zonia by her attorneys Deborah L. Gordon PLC, complains against
Defendant as follows:

EXHIBIT 2

11.01/20/11.15:57:36.45444

Jurisdiction and Parties

1. This is an action for wrongful discharge in violation of Michigan public policy ("public policy tort") arising out of Plaintiff's employment with Defendant.

2. Plaintiff **Susan Zonia** (hereafter Plaintiff) is a resident of Oakland County, Michigan.

3. Defendant **Trinity Health - Michigan d/b/a St. Joseph Mercy Hospital, Pontiac** (hereafter Defendant **St. Joseph**) is a domestic corporation located in Oakland County, Michigan.

4. The events giving rise to this cause of action occurred in Oakland County, Michigan.

5. The amount in controversy exceeds \$25,000.00, exclusive of interest, costs, and attorney fees and the matter is otherwise within the jurisdiction of this Court.

Background Facts

6. On or about January 2006 Plaintiff was hired by Defendant as the Director of Medical Education.

7. Plaintiff's performance was, at all times, satisfactory or better.

8. Over the four years Plaintiff was employed by Defendant, her salary was increased more than 30 percent.

9. Plaintiff was elected President of the National Organization of Directors of Medical Education in 2009. She was the first woman and first nonphysician to be elected to this position.

10. Plaintiff was also awarded the Leadership Award in April 2010 by the same organization.

11. During Plaintiff's employment she objected to and refused to acquiesce in the violation of numerous laws.

FILED 05/19/11 15:57:36 45445

12. As an example, in or about March 2009 Plaintiff objected to an attending physician's unlawful possession of a switchblade on hospital property.

13. In or about July 2010, Plaintiff objected to violations of federal immigration law by residents who were moonlighting in the Internal Medicine Department.

14. As a result of Plaintiff's objections, the practice ceased and attending physicians in Internal Medicine were required to handle on call matters at all hours.

15. In or about September 2010, a doctor requested to have a student shadow him in the hospital, including the Labor and Delivery Department.

16. Plaintiff objected to the request, because the Defendant had a policy directly prohibiting such conduct and because it threatened to violate both patient privacy and confidentiality laws, including but not limited to the Health Insurance Portability and Accountability Act (HIPAA).

17. On or about October 1, 2010, Plaintiff was terminated in retaliation for her complaints about violations of law and policy occurring in the hospital.

COUNT ONE
WRONGFUL DISCHARGE IN VIOLATION OF PUBLIC POLICY

18. Plaintiff repeats and realleges paragraphs 1 through 17 as though set forth in full herein.

19. During her employment with Defendant, Plaintiff refused to violate or acquiesce in violation or suspected violations of laws including, but not limited to: federal immigration law and laws protecting patient privacy and confidentiality, including the Health Insurance Portability and Accountability Act (HIPAA).

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20. Plaintiff's termination was carried out, in part, in retaliation for her failure and refusal to violate laws or acquiesce in violations of law.

21. Plaintiff's termination violated clearly established public policy of the State of Michigan that an employer may not discharge an employee where the alleged reason for the discharge of the employee is the failure or refusal to violate a law in the course of employment.

22. The actions of Defendant, their agents, representatives and employees were intentional and willful, and were in deliberate disregard of and made with reckless indifference to the rights and sensibilities of Plaintiff.

23. As a direct and proximate result of those actions, the terms, conditions and privileges of Plaintiff's employment were adversely affected, and Plaintiff was unlawfully terminated.

24. As a further direct and proximate result of Defendant's wrongful acts, Plaintiff has sustained injuries and damages including but not limited to: loss of earnings and earning capacity; loss of career opportunities; loss of fringe and pension benefits; mental anguish; anxiety about her future; physical and emotional distress; humiliation and embarrassment; loss of professional reputation; damage to her good name and reputation; and loss of the ordinary pleasures of everyday life, including the right to pursue gainful employment of her choice.

Relief Requested

Plaintiff demands judgment against Defendant as follows:

A. Legal Relief:

1. Compensatory damages in whatever amount above Twenty Five Thousand Dollars (\$25,000.00) Plaintiff is found to be entitled;
2. Exemplary damages in whatever amount above Twenty Five Thousand Dollars (\$25,000.00) Plaintiff is found to be entitled; and

T11.01/20/11.15:57:36.45447

3. An award of interest, costs, reasonable attorney fees, and expert witness fees.
- B. Equitable Relief:
1. An order from this Court placing Plaintiff in the position she would have been in had there been no wrongdoing by Defendant;
 2. An injunction out of this Court prohibiting any further acts of wrongdoing;
 3. An award of interest, costs and reasonable attorney fees; and,
 4. Whatever other equitable relief appears appropriate at the time of final judgment.

DEBORAH L. GORDON, PLC



Deborah L. Gordon (P27058)
Carol A. Laughbaum (P41711)
Attorneys for Plaintiffs
33 Bloomfield Hills Parkway, Suite 275
Bloomfield Hills Michigan 48304
Telephone 248 258 2500

Dated: January 19, 2010

JURY DEMAND

Plaintiff **Susan Zonia**, by her attorneys Deborah L. Gordon, PLC, demands a trial by jury of all the issues in this cause.

DEBORAH L. GORDON, PLC

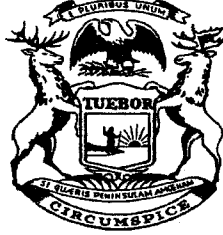


Deborah L. Gordon (P27058)
Carol A. Laughbaum (P41711)
Attorneys for Plaintiffs
33 Bloomfield Hills Parkway, Suite 275
Bloomfield Hills Michigan 48304
Telephone 248 258 2500

Dated: January 19, 2010

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NOTICE OF SUSPENSION
(By Consent)

Case No. 10-61-JC

Notice Issued: January 6, 2011

David B. Gunsberg, P 24235, Birmingham, Michigan, by the Attorney Discipline Board Tri-County Hearing Panel #78.

1. Suspension - 30 Days
2. Effective December 15, 2010

The respondent and the Grievance Administrator submitted a stipulation for consent order of discipline in accordance with MCR 9.115(F)(5). The stipulation was approved by the Attorney Grievance Commission and was accepted by a hearing panel. The stipulation contains respondent's admission that he was convicted of the misdemeanor criminal offenses of Unlawful Restraint, contrary to Ohio Revised Code Section 2905.03(A), Riot, contrary to Ohio Revised Code Section 2917.03(B), and Negligent Assault, contrary to Ohio Revised Code Section 2903.14.

Pursuant to the agreement of the parties, the hearing panel ordered that respondent's license to practice law in Michigan be suspended for 30 days, effective December 15, 2010. Costs were assessed in the amount of \$884.71.


John F. Van Bolt

Dated: **JAN - 6 2011**

EXHIBIT 3

Ohio.com mobile edition

Judge sentences four in nursing home case

Couple and lawyers try to remove resident

By Bill Lilley
Beacon Journal staff writer

POSTED: 02:30 a.m. EST, Nov 11, 2009



Dr. Sharon Rothstein Steinberg (left) and her husband David Steinberg, the chief financial officer of the Detroit Symphony, talk to their attorney John McCaffrey before being sentenced by Judge Judith Hunter in the Summit County Courthouse for their pleading guilty to aggravated riot and unlawful restraint in the kidnapping of her father from a Bath Township nursing home Tuesday in Akron. (Karen Schiely/Akron Beacon Journal)

Two attorneys and a couple from Michigan were sentenced for their roles in removing a man with Alzheimer's disease from a Summit County nursing home.

Among the defendants was Dr. Sharon Rothstein Steinberg, daughter of a former prominent Akron anesthesiologist, who is a licensed physician herself, and her husband, David Steinberg, the former chief financial officer of the Detroit Symphony Orchestra. The couple avoided a six-month prison term and \$2,500 fines when sentenced Tuesday by Summit County Common Pleas Judge Judith Hunter.

Michigan attorneys David Gunsberg and Bryan Schefman were ordered to serve 30 days in Glenwood Jail and pay a \$500 fine for their role in removing the man from the nursing home.

The case stems from a strange series of events Feb. 24, 2008, in which the Steinbergs orchestrated the removal of Dr. Lawrence Rothstein, who practiced at Akron City Hospital for 31 years, from Arden Court in Bath Township.

The couple had been prevented by a court order from removing Rothstein from the nursing home.

EXHIBIT 4

"This is not a happy day," said Bath resident Lani Rothstein, who has been married to Lawrence Rothstein for more than 50 years. "We've lost sleep over this. We have had nightmares over this. My children have lost time at work over this.

"I don't want another family to ever have to go through what we have gone through."

Lani Rothstein also requested that Hunter order her daughter, Sharon Rothstein Steinberg, and David Steinberg, to stay away.

"I don't want to be bothered by those defendants," she said.

After the couple took Lawrence Rothstein, now 80, Lani Rothstein had to get a court order in Michigan to have her husband returned to Summit County by ambulance in the middle of a snowstorm March 5, 2008.

Lawrence Rothstein was taken to St. Thomas Hospital for treatment after the ordeal. He spent nine days in the hospital and reportedly had four teeth missing from his dentures.

Charge reduced

The Summit County prosecutor had originally charged the couple with kidnapping. The Steinbergs, who live in Farmington Hills, Mich., pleaded guilty to aggravated riot, a felony, on Oct. 13.

Hunter ordered the Steinbergs to be on probation for 12 months.

Hunter said she was pleased that both "were stepping up and taking some of the ownership of this case" in her decision to suspend the prison sentences.

"Their lives have been characterized as great contributors to society," Hunter said.

Attorneys apologize

Schefman was charged with unlawful restraint and riot.

Gunsberg was charged with unlawful restraint, riot and negligent assault stemming from the removal of Lawrence Rothstein from the dining room of the Alzheimer's center and a subsequent melee in the parking lot that resulted in a female employee injuring her knee and a male employee suffering a permanently damaged finger.

Schefman and Gunsberg expressed remorse for their actions and apologized to the Rothstein family. They were ordered by Hunter to begin serving their jail terms before Jan 1.

Hunter expressed hope that the Rothsteins could put their fractured family back together.

"There is the patriarch sitting out at Arden Court not knowing what has been going on," Hunter said.

"My hope is that the healing can begin. Now is the time to go forward with

forgiveness and open hearts in this family."

Bill Lilley can be reached at 330-996-3811 or
blilley@thebeaconjournal.com.

[+ More Local News Headlines](#)

[< Back to Mobile Edition](#)

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UNITED STATES DISTRICT COURT
IN THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AMERICAN UNIVERSITY OF ANTIGUA,
COLLEGE OF MEDICINE, a foreign corporation,

Plaintiff,

V

Case No.

STEVEN WOODWARD,

Defendant.

ERIC A. BUIKEMA (P58379)
Cardelli, Lanfear, & Buikema, PC
Attorneys for Plaintiff
322 W. Lincoln
Royal Oak, MI 48067
(248) 544-1100

**PLAINTIFF'S VERIFIED COMPLAINT AND EX PARTE REQUEST FOR
TEMPORARY RESTRAINING ORDER**

NOW COMES Plaintiff, American University of Antigua, College of Medicine, by and through its attorneys, CARDELLI, LANFEAR & BUIKEMA, P.C., and for its Verified Complaint and Ex Parte Request for Temporary Restraining Order, states as follows:

1. Plaintiff American University of Antigua, College of Medicine ("AUA") is an Antiguan corporation located at University Place, Antigua, West Indies.
2. Plaintiff places students in certain Michigan hospitals for clinical education and training.

EXHIBIT

5

3. Defendant Steven Woodward is a resident of Flint, Michigan who, upon last information and belief, makes his home on a sailboat in the vicinity of Flint, Michigan.

4. This action arises, in most basic summary, out of Defendant's ownership and publication of a website, and derivative publications, containing false and defamatory information about AUA, as well as private information about AUA students protected from disclosure under the Family Educational Rights and Privacy Act ("FERPA"), 20 U.S.C. § 1232(g), and by his use of a confusingly similar domain name ("www.aua-med.com") that infringes upon and/or dilutes AUA's protected trade name under Federal Statutory and common law including, but not limited to, the United States Trademark Act of 1946 (the "Lanham Act"), 15 U.S.C. § 1125(c), and the Anticybersquatting Consumer Protection Act ("ACPA"), 15 U.S.C. § 1125(d).

5. The amount in controversy exceeds \$75,000 exclusive of fees, costs or interest.

6. This court has jurisdiction over Plaintiff's Federal Statutory claims pursuant to 28 U.S.C. § 1331, and supplemental jurisdiction over Plaintiff's common law claims pursuant to 28 U.S.C. § 1367. As there exists complete diversity of citizenship amongst the parties, this court further has jurisdiction pursuant to 28 U.S.C. § 1332.

7. As the sole Defendant is a resident of this judicial district, venue is proper pursuant to 28 U.S.C. § 1391.

GENERAL ALLEGATIONS

8. AUA is a foreign medical school catering, in part, to students from the United States including Michigan.

9. AUA regularly places and directs students in clinical education in association with Michigan hospitals.

10. Defendant Steven Woodward is a former student of AUA.

11. As a result of misconduct, Defendant was discharged from AUA without completion of his degree.

12. That is, Defendant is a disgruntled former student of AUA.

13. As a result of his dismissal from the University, Defendant initiated a lawsuit against AUA and its educational partner hospital Trinity-Health Michigan's St. Joseph Mercy Hospital in Pontiac, Michigan.

14. The lawsuit was filed in the Oakland County Circuit Court on or about December 20, 2007, where it was known as Case No. 07-088103-CZ and assigned to the Honorable Shalina Kumar.

15. In the suit, Mr. Woodward alleged that AUA and/or Trinity slandered him, intentionally inflicted emotional distress, tortiously interfered with a contractual relationship, invaded a right to privacy and breached a contract.

16. The court concluded that Mr. Woodward's allegations were baseless and granted AUA summary disposition of the same on June 30, 2008. The court similarly granted summary disposition to Trinity on April 29, 2009 finding, on the merits, that the claimed defamatory remarks as to Woodward's misconduct were actually, in fact, true.